

# EXHIBIT H



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# Transcript of Aris Silzars

**Date:** June 10, 2025

**Case:** Phenix Longhorn LLS -v- AU Optronics Corp., et al.

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Transcript of Aris Silzars  
Conducted on June 10, 2025

1 (1 to 4)

1	1	3
1	IN THE UNITED STATES DISTRICT COURT	1 APPEARANCES:
2	FOR THE EASTERN DISTRICT OF TEXAS	2
3	MARSHALL DIVISION	3 FOR PLAINTIFFS:
4		4 WOMBLE BOND DICKINSON (US) LLP
5 PHENIX LONGHORN LLC, :		5 BY: RODNEY MILLER, ESQ.
6 Plaintiff, :		6 Attorney at Law
7 vs. : Case No.		7 1331 Spring Street NW
8 AU OPTRONICS CORPORATION, : 2:23-CV-00477-RWS-RSP		8 Suite 1400
9 HISENSE ELECTRONICA MEXICO, :		9 Atlanta, Georgia 30309
10 S.A. DE C.V., HISENSE USA :		10 404.872.7000
11 CORPORATION, HISENSE VISUAL :		11
12 TECHNOLOGY CO., LTD., and DOES :		12 WOMBLE BOND DICKINSON (US) LLP
13 1-10, :		13 BY: JOHN H. WRIGHT, III, ESQ.
14 Defendants. :		14 555 Fayetteville Street
15 -----x		15 Suite 1100
16		16 Raleigh, North Carolina 27601
17 DEPOSITION OF ARIS SILZARS		17 919.755.2100
18 Via Zoom Videoconference		18
19 Tuesday, June 10, 2025		19
20		20
21 Stenographically Reported by:		21
22 JUSTYNE N. JOHNSON		22
23 RPR, CSR. No. 14301		23
24 Job No. 586699		24
25 Pages 1-87		25
2	2	4
1 The Deposition of ARIS SILZARS, was taken on behalf of	1 APPEARANCES (Continued):	
2 Plaintiff, all parties appearing remotely via Zoom	2	
3 videoconference, beginning at 9:07 A.M., Pacific time, on	3 FOR DEFENDANTS	
4 June 10, 2025, before JUSTYNE JOHNSON, RPR, Certified	4 PERKINS COIE, LLP	
5 Shorthand Reporter No. 14301.	5 BY: RUBEN TYLER KENDRICK, ESQ.	
6	6 Attorney at Law	
7	7 1301 Second Avenue	
8	8 Suite 4200	
9	9 Seattle, Washington 98101-3805	
10	10 206.359.8000	
11	11	
12	12 ALSO PRESENT:	
13	13 Kasey Koballa, Esquire	
14	14	
15	15	
16	16	
17	17	
18	18	
19	19	
20	20	
21	21	
22	22	
23	23	
24	24	
25	25	

Transcript of Aris Silzars  
Conducted on June 10, 2025

2 (5 to 8)

5			7		
1	INDEX		1	June 10, 2025   9:07 A.M.	
2	WITNESS	EXAMINATION	2		
3	ARIS SILZARS		3		
4	BY MR. MILLER.....9		4	EXHIBIT TECHNICIAN: Thank you to everyone for	
5			5	attending this proceeding remotely, which we anticipate	
6			6	will run smoothly. Please remember to speak slowly and do	
7			7	your best not to talk over one another. Please be aware	
8			8	that we are recording this proceeding for backup purposes.	
9			9	Any off-the-record discussions should be had away	
10			10	from the computer, and please remember to mute your mic	
11			11	for those conversations. Please have your video enabled	
12			12	to help the reporter identify who is speaking. If you are	
13			13	unable to connect with video and are connecting via audio	
14			14	alone, please identify yourself before speaking.	
15			15	We will provide a complimentary unedited	
16			16	recording of this proceeding with the purchase of a	
17			17	transcript. And I apologize in advance for any possible	
18			18	technical-related interruptions. Thank you.	
19			19	THE STENOGRAPHER: Good morning. We are going on	
20			20	the record at 9:07 a.m. on Tuesday, June 10, 2025, in the	
21			21	matter of Phenix Longhorn, LLC, v. AU Optronics	
22			22	Corporation, et al., Case Number 2:23-cv-00477-RWS-RSP.	
23			23	Today's deposition is taking place remotely via Zoom	
24			24	videoconference.	
25			25	My name is Justyne Johnson. I am a California	
6			8		
1	EXHIBITS		1	certified shorthand reporter representing the firm Planet	
2	EXHIBIT	DESCRIPTION PAGE	2	Depos, and my certification number is 14301. The deponent	
3	EXHIBIT 1	Declaration of Aris Silzars 11	3	is Dr. Aris Silzars.	
4		regarding claim construction	4	Counsel, can you please introduce yourselves?	
5		of U.S. Patent Numbers	5	THE WITNESS: I'm sorry. Say that again?	
6		7,233,305 and 7,557,788	6	THE STENOGRAPHER: I asked counsel to introduce	
7	EXHIBIT 2	United States Patent Number 19	7	themselves.	
8		7,223,305	8	THE WITNESS: Okay. It's Aris, A-r-i-s, Silzars,	
9	EXHIBIT 3	United States Patent Number 22	9	S-i-l-z-a-r-s.	
10		7,557,788	10	MR. MILLER: Counsel for Phenix long -- Longhorn,	
11	EXHIBIT 4	Joint claim construction and 42	11	LLC. My name is Rodney Miller of Womble Bond Dickinson,	
12		prehearing statement	12	LLP.	
13			13	MR. WRIGHT: This is John Wright of Womble Bond	
14			14	Dickinson on behalf of Plaintiff, Phenix Longhorn, LLC.	
15			15	MR. KENDRICK: Ruben Tyler Kendrick on behalf of	
16			16	Defendant AUO Corporation, the witness.	
17			17	MS. KOBALLA: Kasey Koballa of Kilpatrick on	
18			18	behalf of the Hisense defendants.	
19			19	THE STENOGRAPHER: Dr. Silzars, can you raise	
20			20	your right hand, please?	
21			21		
22			22	ARIS SILZARS,	
23			23	having first been sworn by the Certified Shorthand	
24			24	Reporter, was examined and testified as follows:	
25			25	THE WITNESS: I do.	

<p>9</p> <p>1 THE STENOGRAPHER: Please proceed, Counsel.</p> <p>2</p> <p>3 EXAMINATION</p> <p>4 BY MR. MILLER:</p> <p>5 Q Good morning or good afternoon, Dr. Silzars. Can</p> <p>6 you -- can you, again, please state your full name for the</p> <p>7 record?</p> <p>8 A Aris, A-r-i-s, Silzars, S-i-l-z-a-r-s.</p> <p>9 Q And I just want to confirm, have you been deposed</p> <p>10 before?</p> <p>11 A Yes.</p> <p>12 Q And have you been deposed before remotely?</p> <p>13 A Yes. Yeah. By the way, one thing with regard to</p> <p>14 being deposed remotely, the speakers on my laptop are not</p> <p>15 the greatest. And so to the extent that you can speak</p> <p>16 clearly and speak up, it will help. If I do have a</p> <p>17 problem, I'll let you know if I don't understand a</p> <p>18 question. But right now, I'm doing okay. But you</p> <p>19 could -- you could go a little bit louder, if you can.</p> <p>20 Q Okay. Thank you very much. You know, I</p> <p>21 appreciate -- I appreciate your ground rules. And I kind</p> <p>22 of -- I echo that sentiment to you.</p> <p>23 A Right now, it's sounding better -- it's sounding</p> <p>24 okay.</p> <p>25 Q Okay. So I turned my volume up and I -- so I</p>	<p>11</p> <p>1 for the claim construction?</p> <p>2 MR. MILLER: Yes, sir.</p> <p>3 EXHIBIT TECHNICIAN: And we will be marking it as</p> <p>4 Exhibit 1?</p> <p>5 MR. MILLER: Yes, we will be marking as</p> <p>6 Exhibit 1.</p> <p>7 EXHIBIT TECHNICIAN: All right. It will be on</p> <p>8 the screen in a moment.</p> <p>9 (Exhibit 1 was marked for identification by the</p> <p>10 Certified Shorthand Reporter and is attached hereto.)</p> <p>11 (Exhibit 1, page 1, was displayed.)</p> <p>12 BY MR. MILLER:</p> <p>13 Q All right. Mister -- or sorry. Dr. Silzars, do</p> <p>14 you recognize this as the cover page of this document?</p> <p>15 A Yes. I'm just comparing it to my clean copy</p> <p>16 here. And -- yes. That's -- that's my declaration.</p> <p>17 Q Which -- if we were in person, I'd ask to see a</p> <p>18 copy of your clean copy that you have.</p> <p>19 A I -- I'm sorry. Now, I didn't get the last thing</p> <p>20 you said.</p> <p>21 Q I said if we were in person, I would ask to see a</p> <p>22 copy of your clean copy to make sure we're looking at the</p> <p>23 same thing.</p> <p>24 A Yes. I do have a clean copy in front of me. I</p> <p>25 have the declaration and the patents that are also clean</p>
<p>10</p> <p>1 just, for you as well, you know. I can -- I can hear you</p> <p>2 a little bit. I put my speaker volume up to about 80.</p> <p>3 So, you know, hopefully, you know, we can talk to each</p> <p>4 other.</p> <p>5 A Yeah. Right now, we're doing okay. If we're --</p> <p>6 if I'm not understanding a question or missing something,</p> <p>7 I'll ask you to repeat, which I hope won't be too</p> <p>8 frustrating.</p> <p>9 Q All right. So, again, you're a seasoned veteran</p> <p>10 in this. We -- I will ask you questions. And I will --</p> <p>11 I'm assuming that, you know, give your counsel an</p> <p>12 opportunity to object if necessary. But then you, in</p> <p>13 turn, will answer that particular question. And, you</p> <p>14 know, because it's remote, I just repeat again that, you</p> <p>15 know, just be as clear as possible.</p> <p>16 And you understand, Dr. Silzars, that, you know,</p> <p>17 you're here to testify about -- about some -- about a</p> <p>18 declaration that you submitted in the Phenix Longhorn v.</p> <p>19 AU Optronics and Hisense litigation that's pending in</p> <p>20 Eastern District of Texas; correct?</p> <p>21 A Yeah, that's correct.</p> <p>22 MR. MILLER: Okay. So we're going to -- I want</p> <p>23 to pull up Mr. Silzars [sic] -- his declaration. Can we</p> <p>24 pull that up?</p> <p>25 EXHIBIT TECHNICIAN: Yes, so the declaration is</p>	<p>12</p> <p>1 copies. So...</p> <p>2 Q And just the ground rules. Do you recognize this</p> <p>3 document?</p> <p>4 A Yes.</p> <p>5 Q This exhibit?</p> <p>6 All right. And what is it?</p> <p>7 A The document -- it's my declaration regarding the</p> <p>8 claim construction on the patent '305 and '788.</p> <p>9 Q And can we turn to page 65 of that document, of</p> <p>10 Exhibit 1?</p> <p>11 (Exhibit 1, page 65, was displayed.)</p> <p>12 BY MR. MILLER:</p> <p>13 Q I just want to confirm, Dr. Silzars, that's</p> <p>14 your -- that's your date and your signature on the last</p> <p>15 page?</p> <p>16 A Yes, it is.</p> <p>17 Q And do you believe when you signed this</p> <p>18 declaration that it was complete and accurate?</p> <p>19 A Yes.</p> <p>20 Q And by signing, you were agreeing with and</p> <p>21 adopting the opinions that are in the declaration;</p> <p>22 correct?</p> <p>23 A I -- I'm sorry. Could you repeat that?</p> <p>24 Q And by signing, you were agreeing with and</p> <p>25 adopting the opinions that are in the declaration?</p>

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<p style="text-align: right;">49</p> <p>1 information that was provided to me earlier in the report</p> <p>2 in describing how a "means plus function" term should be</p> <p>3 analyzed. So I simply applied the detailed knowledge that</p> <p>4 was provided to do the analysis. So given the explanation</p> <p>5 of how the process works, I simply applied it in using</p> <p>6 common understanding, not particularly making an</p> <p>7 assumption that I had to be a legal expert in order to</p> <p>8 understand the language.</p> <p>9 BY MR. MILLER:</p> <p>10 Q All right, Dr. Silzars, but the conclusion as to</p> <p>11 whether or not that term is a means plus function is a</p> <p>12 question of law; is that correct?</p> <p>13 MR. KENDRICK: Object to the scope.</p> <p>14 THE WITNESS: Well, it's a question of</p> <p>15 interpretation. And I suppose with everything in my</p> <p>16 declaration, at some point, the Court is going to decide</p> <p>17 if my analysis is correct or not. So I'm proposing an</p> <p>18 analysis and I'm proposing an interpretation that I</p> <p>19 believe to be valid. Eventually this decision will have</p> <p>20 to be made by the Court, and that is the actual</p> <p>21 interpretation of the law. I can propose an</p> <p>22 interpretation and I can propose an analysis. But the</p> <p>23 final say is in the Court.</p> <p>24 BY MR. MILLER:</p> <p>25 Q Going to walk through some of these terms here</p>	<p style="text-align: right;">51</p> <p>1 <b>inputs for your flat panel television and routes them to</b></p> <p>2 <b>the right place. That can be a control circuit. So</b></p> <p>3 <b>it's -- it -- we have to define what we mean by it. But</b></p> <p>4 <b>in general, a control circuit is a circuit that controls</b></p> <p>5 <b>something.</b></p> <p>6 Q And in that same paragraph 73, page 26 of your</p> <p>7 report --</p> <p>8 (Exhibit 1, page 29, was displayed.)</p> <p>9 MR. MILLER: -- just going to go to the number 1</p> <p>10 in there. You said, "The term control circuit represents</p> <p>11 an extremely broad class of structures."</p> <p>12 What do you mean by "broad class of structures"?</p> <p>13 <b>A Just, for example, what I just mentioned, that a</b></p> <p>14 <b>light switch is a structure. It controls something. It</b></p> <p>15 <b>controls light coming on and off. A complicated circuit</b></p> <p>16 <b>board that controls many functions coming into a flat</b></p> <p>17 <b>panel TV and then selects how they're routed to the</b></p> <p>18 <b>television. That can be control -- considered a control</b></p> <p>19 <b>circuit. The control circuit is one that we have to</b></p> <p>20 <b>define, otherwise it's just what I said. It's a circuit</b></p> <p>21 <b>that controls something typically electrical.</b></p> <p>22 Q So it's a circuit that controls something</p> <p>23 electrical. Is that a structure?</p> <p>24 <b>A Is that -- is that what -- what was the last</b></p> <p>25 <b>part?</b></p>
<p style="text-align: right;">50</p> <p>1 that you've offered an opinion on, Dr. Silzars.</p> <p>2 MR. KENDRICK: Rodney, just give -- before you do</p> <p>3 that, can I suggest a break. We've been going about an</p> <p>4 hour since the short break we had. And so I don't know if</p> <p>5 you're going to now switch to plaintiff terms. It may be</p> <p>6 helpful to have a short break here so Aris can use the</p> <p>7 bathroom, et cetera.</p> <p>8 MR. MILLER: That's fine. How long you want? 15</p> <p>9 minutes?</p> <p>10 MR. KENDRICK: 10, 15 work for me.</p> <p>11 MR. MILLER: Let's do 15.</p> <p>12 MR. KENDRICK: Okay. 15.</p> <p>13 MR. MILLER: Let's go off the record.</p> <p>14 THE STENOGRAPHER: Off the record at 10:22 a.m.</p> <p>15 (Off the record.)</p> <p>16 THE STENOGRAPHER: Back on the record at 10:35</p> <p>17 a.m. Please proceed.</p> <p>18 BY MR. MILLER:</p> <p>19 Q Welcome back, Dr. Silzars.</p> <p>20 All right. Dr. Silzars, do you know what a</p> <p>21 control circuit is?</p> <p>22 <b>A A control -- many things can be a control</b></p> <p>23 <b>circuit. It's kind of a generic, broad term that could</b></p> <p>24 <b>apply to -- a light switch is a control circuit. A</b></p> <p>25 <b>complex device that, as I mentioned -- that takes various</b></p>	<p style="text-align: right;">52</p> <p>1 Q Let me repeat the question again. Is a circuit</p> <p>2 that controls -- is that a structure?</p> <p>3 <b>A Is that a structure?</b></p> <p>4 Q Yes. A circuit that controls, is it a structure?</p> <p>5 <b>A I think the last word you're using is</b></p> <p>6 <b>"structure." And it -- well, certainly in the common</b></p> <p>7 <b>usage, a circuit -- a control circuit is -- the circuit</b></p> <p>8 <b>itself implies a structure in the common usage in</b></p> <p>9 <b>electrical engineering. If I tell you that I have a</b></p> <p>10 <b>circuit, I'm referring to something that is -- that I can</b></p> <p>11 <b>look at; something I could, you know, it may be a portion</b></p> <p>12 <b>of something, but it is a thing.</b></p> <p>13 <b>So a control circuit in typical usage would be a</b></p> <p>14 <b>thing. It would be a structure. It's something that we</b></p> <p>15 <b>can identify as -- and point to. It's not a -- some</b></p> <p>16 <b>esoteric concept. It's a circuit. A circuit is a</b></p> <p>17 <b>circuit. It's something we can hang -- we can look at and</b></p> <p>18 <b>analyze.</b></p> <p>19 Q Dr. Silzars, by any chance, do you recall when</p> <p>20 you -- when you reviewed the -- the Wistron claim</p> <p>21 construction order? Do you recall reviewing the Court's</p> <p>22 analysis on circuits for programming?</p> <p>23 <b>A I recall reading them, but I don't -- do not</b></p> <p>24 <b>recall the specifics of what that said.</b></p> <p>25 Q And in drafting this section on control circuits,</p>

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16 (61 to 64)

<p style="text-align: right;">61</p> <p>1 report. When I'm asked to do an analysis, I make that as 2 an independent analysis based on my expertise and based on 3 my understanding of the technology. 4 I may use other references. I may look at other 5 constructions. But the end result is my work, is my -- is 6 based on my conclusions and based on my analysis. And 7 I've presented them in considerable detail in my 8 declaration. So I have gone through and presented all of 9 the reasoning behind my analysis. So it stands 10 independent of references. 11 BY MR. MILLER: 12 Q All right. So Dr. Silzars, so you're saying that 13 you can come up with a declaration for claim construction 14 and you could propose claim constructions that are 15 different or inconsistent from the claim constructions 16 that your client is proposing? 17 MR. KENDRICK: Objection to the extent it 18 mischaracterizes testimony. Object to form. Object to 19 scope. 20 THE WITNESS: First of all, I did not say that 21 they were inconsistent. 22 BY MR. MILLER: 23 Q No. That's -- 24 <b>A The client has proposed several options --</b> 25 <b>25 different opportunities, different possible</b></p>	<p style="text-align: right;">63</p> <p>1 client has proposed. So you keep using the term 2 "disagree." I don't think that's an appropriate way to 3 suggest what I'm saying. 4 MR. MILLER: We're going to jump to page 40. The 5 gamma reference control capability. 6 MR. KENDRICK: Is that page 40 of Exhibit 1, 7 Counsel? 8 MR. MILLER: Yes. Sorry. Page 40 of Exhibit 1, 9 Dr. Silzars's declaration. Look at gamma reference 10 control capability. 11 BY MR. MILLER: 12 Q Similar to the other one, I just want to confirm, 13 Dr. Silzars, you did not take into account in your 14 analysis your client's propo -- sorry, your client's 15 alternative construction as related to gamma reference 16 control capability in your analysis; is that correct? 17 <b>A That's correct.</b> 18 MR. KENDRICK: Objection. 19 THE WITNESS: I'm just mentioning one more time 20 that there is nowhere in my declaration that I have -- 21 other than the list that's been provided where I have done 22 any comparison or analysis and reliance on a client's 23 construction. 24 THE STENOGRAPHER: And what was the objection? 25 MR. KENDRICK: Scope and form. Thanks, Justyne.</p>
<p style="text-align: right;">62</p> <p>1 <b>interpretations. I'm not in disagreement with any of</b> 2 <b>those that the client has proposed. However, what I am</b> 3 <b>presenting in my declaration is a conclusion that is based</b> 4 <b>on a very thorough analysis. And that conclusion leads to</b> 5 <b>a specific outcome. And that is what I am offering to the</b> 6 <b>court as the best possible interpretation of how these</b> 7 <b>terms should be treated.</b> 8 Q Okay. So is it possible that you can do an 9 independent analysis and come up with a construction that 10 is different from the proposed construction of Hisense and 11 AUO? 12 MR. KENDRICK: Objection. Scope. Objection. 13 Form. 14 THE WITNESS: As I said, it looks like the client 15 has proposed some alternatives. I have done the analysis 16 independent of those proposed alternatives. And my 17 conclusion is that those alternatives are not necessary. 18 BY MR. MILLER: 19 Q So do you agree or disagree with your client's 20 alternative construction? 21 MR. KENDRICK: Objection. Scope. Form. Asked 22 and answered. 23 THE WITNESS: I've mentioned several times now, 24 it's not a disagreement. It's a different approach in 25 doing a thorough analysis. I don't disagree with what the</p>	<p style="text-align: right;">64</p> <p>1 BY MR. MILLER: 2 Q And Dr. Silzars, just trying to get a -- just a 3 general understanding of your opinion on gamma reference 4 control capability and why you believe that is indefinite. 5 <b>A Because there is no explanation either in the</b> 6 <b>claim itself or in the specification as to what one might</b> 7 <b>think a control capability is. It can be many things and</b> 8 <b>the specification is -- says nothing about it. And the</b> 9 <b>claim does not explain what is meant by a control</b> 10 <b>capability.</b> 11 Q So when you did your analysis for control 12 capa- -- gamma reference control capability, did you -- 13 how did you perform that analysis? Did you simply search 14 for that particular term in the specifications or did you 15 actually analyze the specifications to determine whether 16 or not -- 17 <b>A No.</b> 18 Q -- you had (indiscernible) -- 19 <b>A Well, certainly -- of course, no, I analyzed the</b> 20 <b>specifications. There's no mention of a control</b> 21 <b>capability in the specification. There's certainly</b> 22 <b>reference to -- there's certainly quite a discussion about</b> 23 <b>gamma and gamma reference. But nothing about what is</b> 24 <b>meant by "control capabilities." So if we were to -- if</b> 25 <b>we were to look at a product that possibly practices this</b></p>



<p style="text-align: right;">65</p> <p>1 patent, we would really have no idea what to point to as</p> <p>2 identifying the structure that it (video interference) --</p> <p>3 Q All right. Dr. Silzars, let's look at --</p> <p>4 A -- full capability.</p> <p>5 Q Let's look at the patent -- let's go to the '788</p> <p>6 patent.</p> <p>7 MR. MILLER: Can we pull up Exhibit -- it's</p> <p>8 Exhibit 3.</p> <p>9 And we're going to go to -- it should be the back</p> <p>10 of Exhibit 3, the end of Exhibit 3. It should be starting</p> <p>11 in the (audio interference) --</p> <p>12 THE STENOGRAPHER: I'm sorry?</p> <p>13 MR. MILLER: It's starting in column 7. Slide</p> <p>14 down. Let's take a look at -- you said, "We claim: 1."</p> <p>15 (Exhibit 3, page 11, was displayed.)</p> <p>16 BY MR. MILLER:</p> <p>17 Q All right. So we're going to look at claim 1A</p> <p>18 and we'll look at claim 1E. The claim reads, in part,</p> <p>19 "providing said display with gamma reference control</p> <p>20 capability which is electronically reprogrammable and</p> <p>21 non-volatile."</p> <p>22 A Are you reading the se- -- the phrase "E" when</p> <p>23 you just --</p> <p>24 Q (Indiscernible) --</p> <p>25 A -- read that?</p>	<p style="text-align: right;">67</p> <p>1 break, please?</p> <p>2 MR. MILLER: Sure.</p> <p>3 THE STENOGRAPHER: Off the record at 11:05.</p> <p>4 (Off the record.)</p> <p>5 THE STENOGRAPHER: Back on the record at</p> <p>6 11:11 a.m. Please proceed.</p> <p>7 BY MR. MILLER:</p> <p>8 Q All right. Dr. Silzars, we're go -- Dr. Silzars,</p> <p>9 we're going back to -- we're at claim 1A. We're looking</p> <p>10 at claim 1E of the 7A [sic]. And I'm just trying to get</p> <p>11 your understanding of why you believe gamma reference</p> <p>12 control capability is a function and not a structure.</p> <p>13 MR. KENDRICK: Object to the form.</p> <p>14 THE WITNESS: Okay. Please, if you had a</p> <p>15 question, I didn't get it. I -- I'm back to claim 1. And</p> <p>16 I think you said claim 1E, like "echo."</p> <p>17 BY MR. MILLER:</p> <p>18 Q Claim 1A. (Indiscernible.)</p> <p>19 A 1A. Okay. Like "apple."</p> <p>20 Q You can start with 1A, though. Start with 1A.</p> <p>21 A Okay. There is no structure disclosed in this</p> <p>22 1A. It's -- it talks about gamma control capability which</p> <p>23 is electrically reprogrammable and non-volatile. Well,</p> <p>24 electrically reprogrammable and non-volatile are</p> <p>25 functions; they're not structures.</p>
<p style="text-align: right;">66</p> <p>1 Q I'm looking at 1A. Looking at limitation 1A.</p> <p>2 A Oh, 1A.</p> <p>3 Q Yes, sir.</p> <p>4 A Okay. I thought you were also down back at E.</p> <p>5 Okay.</p> <p>6 Okay. I have read that. Please restate your</p> <p>7 question.</p> <p>8 Q I said which -- by 1A, "providing said display</p> <p>9 with gamma reference control capability which is</p> <p>10 electronically reprogrammable and non-volatile." And then</p> <p>11 we can go to 1E. It says, "storing said gamma reference</p> <p>12 voltage levels in said gamma reference control</p> <p>13 capability."</p> <p>14 And so, Dr. Silzars, from looking at this,</p> <p>15 "providing said display with gamma reference control</p> <p>16 capability which is electronically reprogrammable and</p> <p>17 non-volatile," would you say that the way it's described</p> <p>18 in that claim that the gamma reference control capability</p> <p>19 is a structure?</p> <p>20 A No.</p> <p>21 Q Why not?</p> <p>22 A There's no structure described here.</p> <p>23 Electronically reprogrammable and non-volatile is not a</p> <p>24 structure. That's a function.</p> <p>25 THE STENOGRAPHER: Counsel, can we go on a brief</p>	<p style="text-align: right;">68</p> <p>1 Q All right. So you're saying that "which is</p> <p>2 electronically reprogrammable and non-volatile," it is</p> <p>3 your opinion that those are functions and that those</p> <p>4 functions that are then tied to the claim limitation gamma</p> <p>5 reference control capability, are you saying that that's a</p> <p>6 function as well?</p> <p>7 MR. KENDRICK: Object to the form.</p> <p>8 THE WITNESS: Yes. Control capability has no</p> <p>9 structure associated with it.</p> <p>10 MR. MILLER: Okay.</p> <p>11 THE WITNESS: When we talk about something being</p> <p>12 electronically reprogrammable, what -- tell me what it is.</p> <p>13 There's hundreds of ways to make something electrically</p> <p>14 reprogrammable. And non-volatile, that's just a function.</p> <p>15 Something is either volatile or non-volatile.</p> <p>16 MR. MILLER: Right.</p> <p>17 THE WITNESS: It doesn't tell me what that might</p> <p>18 be. So when you talk about -- that we have a gamma</p> <p>19 reference control capability, we still have no idea what</p> <p>20 that structure might be. And if we were to try to analyze</p> <p>21 a product to see if it practices the invention, we could</p> <p>22 point to almost anything. And say, "Well, that's control</p> <p>23 capability." It's indefinite.</p> <p>24 There's no particular structure identified in the</p> <p>25 specification. And there's no structure that we can point</p>



<p>69</p> <p>1 to in the claim that says, "Oh, yes, that's what that 2 might mean." So it's not even mentioned in the patent 3 specification. So we don't have anything to rely on. 4 So -- 5 Q Okay. I'm going to ask you -- 6 A -- <b>basically have a function here with an 7 undefined -- undefined structure.</b> 8 Q All right. So I'll take that. So -- disagree 9 with it -- we agree to disagree. 10 All right. So let's say -- okay. So you say in 11 looking at that, the gamma reference control capability 12 specifically as it relates to claim 1A is "providing said 13 display with gamma reference control capability," and then 14 1E that says "storing said gamma reference voltages levels 15 in said gamma reference control capability." 16 And in looking at the claims, did you review the 17 specifications to determine whether there was a structure 18 disclosed in the specification that related to that? 19 A <b>I did look at the specification in great detail, 20 and that term is not mentioned in the specification, as 21 far as I could find.</b> 22 Q By any chance, did you look in the specifications 23 and give an example because they are an exemplary 24 embodiment? Did you look at the embodiment in figure 3 25 that it's just a gamma reference controller 300?</p>	<p>71</p> <p>1 controller 300, based on what you're saying. You're 2 saying it's a function. You're saying gamma reference 3 control capability is a function. Could the gamma 4 reference controller 300 that's in figure 3 be a 5 structure? 6 A <b>The specification does not anywhere describe or 7 use the term "control capability." So we are left to 8 guess at what that might mean. And in terms of patent 9 analysis and analyzing whether an invention practices a 10 patent, we shouldn't -- we're not allowed to guess and 11 say, "Well, I think it means this." There are 12 possibilities --</b> 13 Q So -- 14 A -- <b>that it could be, but --</b> 15 Q But -- 16 A -- <b>we don't know that.</b> 17 Q (Indiscernible.) 18 A <b>We're not -- with the specification and the claim 19 indefinite, we can't just start gluing something together 20 hoping that we get the right answer.</b> 21 Q So as a person of ordinary skill in the art, is 22 your opinion because -- what? -- the patent says control 23 capability that it's indefinite? 24 A <b>Yes.</b> 25 THE STENOGRAPHER: I'm sorry. Was there an</p>
<p>70</p> <p>1 A <b>Yes.</b> 2 Q Why is that not providing said display with -- 3 why -- capable -- why -- let me back up. Why is the gamma 4 reference controller not a structure which -- 5 A <b>Because it's not a gamma reference control 6 capability. I don't know what capability it's supposed to 7 be. A gamma reference controller is an -- actually, as 8 it's shown in the patent, is at a very high level. It's 9 what I -- I think the patent even calls it an 10 architectural depiction. It's -- it consists of quite a 11 few circuits. But that's not -- that doesn't tell us what 12 control capability might be. That could be something much 13 broader. It could be something else. It just doesn't -- 14 it doesn't say.</b> 15 Q So could it be the gamma reference control -- 16 MR. KENDRICK: Objection. 17 BY MR. MILLER: 18 Q -- 300? 19 MR. KENDRICK: Sorry. Objection. Form. 20 THE WITNESS: I just missed the last part of what 21 you said. 22 BY MR. MILLER: 23 Q I'm asking you, 'cause, I mean, you said you 24 looked at the specifications. I'm just curious if you 25 just considered that -- whether the gamma reference</p>	<p>72</p> <p>1 objection? 2 MR. KENDRICK: Form. 3 BY MR. MILLER: 4 Q So if the patent said "providing said display 5 with gamma reference controller which is electronically 6 reprogrammable and non-volatile," would that work for you, 7 Dr. Silzars? Would that not be indefinite? 8 MR. KENDRICK: Objection. Scope. Objection. 9 THE WITNESS: I would -- 10 MR. KENDRICK: Incomplete hypothetical. 11 THE WITNESS: That -- yeah. That is a 12 hypothetical, and I'm not prepared to respond to something 13 that I haven't had a chance to analyze. 14 BY MR. MILLER: 15 Q Well, I'm asking you because you are an expert. 16 You graduated from law school [sic] in '67. You have all 17 this experience and you consider yourself (indiscernible) 18 and you offered a declaration. So you analyzed the 19 specification. 20 The specification discusses a gamma reference 21 controller 300. And I'm just curious, in your analysis, 22 could you say, from looking at that, if it said "providing 23 said display with a gamma reference controller," which the 24 patent describes as something that could be electronically 25 reprogrammable and non-volatile, whether that right --</p>

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19 (73 to 76)

<p>73</p> <p>1 whether the inclusion of that term in limitation 1A, 2 whether you believe that would be indefinite? 3 MR. KENDRICK: Objection. Form. Objection. 4 Incomplete hypothetical. And just for the record, 5 Dr. Silzars has not graduated from law school. 6 MR. MILLER: I apologize. 7 THE WITNESS: Okay. 8 MR. MILLER: He got his Ph.D. in 1967. My fault. 9 Correct the record on that. 10 THE WITNESS: I'm not prepared to try to repair 11 the patent. 12 BY MR. MILLER: 13 Q So I'm going to ask again, Dr. Silzars. We asked 14 this -- so I have to ask you. Did you take into account 15 your client's alternative construction for gamma reference 16 control capability when performing your analysis on this 17 term? 18 <b>A I did not.</b> 19 MR. KENDRICK: Objection. Scope. Asked and 20 answered. 21 MR. MILLER: Counsel, it's not an asked and 22 answered because it's a different term. But I'll let you 23 keep objecting. It's fine. 24 MR. KENDRICK: Thank you. 25 ///</p>	<p>75</p> <p>1 would all be terms that might come up in the process of 2 working on a flat panel display. 3 BY MR. MILLER: 4 Q Voltage levels can be represented as analog 5 signals and digital signals; correct? 6 <b>A Okay. I'm sorry. You're going to have to slow 7 down your question or speak more clearly. Some -- I'm 8 missing too much of it. I can't answer something if I 9 don't know what you asked.</b> 10 Q Voltage levels can be represented as analog 11 signals and digital signals; correct? 12 <b>A Voltage level --</b> 13 MR. KENDRICK: Objection. Form. 14 THE WITNESS: -- would typically be expressed as 15 an analog. A digital signal is expressed as a sequence of 16 pulses. So when we talk about a voltage level, a voltage 17 level can be digitized. We can convert it to a digital 18 signal. But a digital signal itself would not be 19 discussed in terms of voltage levels. 20 THE STENOGRAPHER: And was that -- 21 THE WITNESS: They're basically 1s and 0s. It's 22 a sequence of pulses. So it would depend on the context, 23 if I'm working in the digital domain, I could certainly 24 think in terms of expressing voltage levels in the digital 25 domain. But I wouldn't normally talk about a digital</p>
<p>74</p> <p>1 BY MR. MILLER: 2 Q Okay. Dr. Silzars, as a person of ordinary skill 3 in the art, are you familiar with the term "gamma 4 reference voltage levels"? 5 <b>A Gamma reference voltage, and was there another 6 word?</b> 7 Q Term "gamma reference voltage levels." 8 <b>A Yes.</b> 9 Q What is your -- 10 <b>A I'm familiar with the term in the context of this 11 patent.</b> 12 Q I'm asking you, are you familiar with this term 13 period, "gamma reference voltage levels"? Have you heard 14 of that term prior -- for a person of ordinary skill in 15 the art at the time of the invention, have you ever heard 16 of gamma reference voltage levels at the time of the 17 invention? 18 MR. KENDRICK: Object to the form. 19 THE WITNESS: Sure. And it's certainly whenever 20 we're working with gamma control, that would be a likely 21 term to come up, that you would have some kind of a gamma 22 reference curve that you might want to use and that that 23 would be used in programming whatever display that you're 24 working on. So yes, the -- in general, anything to do 25 with gamma reference, gamma voltage, gamma curves, those</p>	<p>76</p> <p>1 level as being a voltage level. 2 BY MR. MILLER: 3 Q All right. So can gamma reference voltage levels 4 be expressed as digital representation? 5 <b>A They can be --</b> 6 Q A digital -- 7 <b>A -- converted to a digital sequence of pulses. If 8 we go from an analog signal, we can go through a digital 9 to analog converter -- analog to digital converter first 10 so we can convert an analog signal into a digital signal. 11 And then at some point, when we've actually operate the 12 display, it has to be converted back to an analog signal.</b> 13 <b>The columns on the display work on the basis of 14 an analog signal always. There -- they are not -- they 15 cannot be -- if you address some of the digital signal, 16 you get 1s and 0s, which would be either all on or all 17 off.</b> 18 <b>If you want gray scale, we have to analog signals 19 on the columns of the display, which then typically means 20 that the input that we would normally operate the display 21 on also has to be analog. So if we want to have a digital 22 version of that, we would have to convert the analog 23 signal to digital pulses. And then for operating the 24 display, we would have to convert it back to analog.</b> 25 Q So I'm going to ask this and say again. Gamma</p>

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20 (77 to 80)

<p>77</p> <p>1 reference voltage levels, can they include a digital 2 representation of -- can they include a digital 3 representation? 4 A I just tried to provide the explanation that if 5 you just talk about gamma reference voltage level, that 6 implies an analog signal. And I said if you want to go 7 through a rather complicated path, you can convert that 8 analog signal to digital and then convert it back to 9 analog for operating the display. That's, you know, a 10 three-step process basically. 11 So when we talk about gamma voltage reference 12 level, I cannot imagine a situation of where you would 13 consider that to be in the digital domain. 14 Q Why is that? 15 A Because we're operating a display that runs in an 16 analog mode. That gamma correction is going to be 17 presented to the columns of the display. The columns of 18 the display cannot be digital. They have to be analog in 19 order to do gray scale. That's absolutely -- that's not 20 up for discussion. 21 If we want to have a gray scale display, if we 22 want to put up a color image on it, it has to be analog. 23 So any kind of gamma voltage correction that we want to 24 present to the columns has to be in analog form. I cannot 25 put a digital gamma correction signal onto the columns of</p>	<p>79</p> <p>1 A digital non-volatile cell, on the other hand, 2 can only represent a 1 or a 0. It cannot represent 3 anything in between. And that's really just by 4 definition. If I have a digital cell, it's just going to 5 be 1 or 0, and nothing in between. 6 Q Dr. Silzars, in your analysis of non-volatile 7 storage cells, in paragraph -- so, you know, specific one 8 I want to talk about -- in paragraph 156 in your 9 discussions, you have discussions on -- 10 A I'm sorry, which paragraph? 11 Q Paragraph 156. 12 A Oh. 156. Okay. 13 Q Paragraph 156. You have a discussion and it 14 continues on. And you have an opinion on whether or not 15 you believe that the named individual of '305 patent or 16 whether the '305 patent taught away from using the digital 17 solution. I'm just trying to confirm, you're not a legal 18 expert; right? 19 A My -- yes. My conclusions in my deposition -- I 20 mean, declaration, excuse me, is that in analyzing this 21 patent, the only possible non-volatile storage cells have 22 to be analog, based on how the patent is only -- only 23 describes analog cells, but also the fact that if we try 24 to replace that analog cell with a digital cell, the 25 device will not operate.</p>
<p>78</p> <p>1 the display and have an operating display. 2 Q I'm going to speak to on the non-volatile storage 3 cells. Dr. Silzars, what's a non-volatile storage cell? 4 A I heard the first part. You said what is the 5 non-volatile storage -- 6 Q (Indiscernible.) 7 A -- and then what? What was the last word? 8 Q What is a "nonvolatile storage cell"? 9 A Cell? Is that the last word? 10 Q Yes, sir. Cells from the -- from the cells. 11 Yes. 12 A Yeah. 13 Q Cell. 14 A It's typically a -- it's a -- just the term 15 "non-volatile storage cell" is simply a memory cell that 16 can retain information af- -- without power having to be 17 connected to it. 18 Q Can a non-volatile storage cell retain both 19 digital and analog information? 20 A It is possible to have a nonvolatile storage cell 21 in either analog or digital format. However, those two 22 are not compatible with each other. I suppose if I -- it 23 can be in one way. An analog non-volatile cell can 24 contain a 1 or a 0. So it can actually represent digital 25 information, and it can also represent analog information.</p>	<p>80</p> <p>1 Q What do you mean by "the device will not 2 operate"? 3 A If the analog cell as described in the patent 4 allows the storage of ten 24 levels. And if we wanted to 5 now replace that analog cell with a digital cell, a 6 digital cell can only represent a 1 or a 0. In order to 7 have ten 24 levels, we need -- for every analog cell, we 8 would have to replace it with 10 digital cells in order to 9 get the 10-bit accuracy that ten 24 levels represents. 10 So we would have to do several things in order to 11 create an operating device that would be quite different 12 than what's described in the patents. 13 We would have to first take the analog input 14 signal, which is what the patent describes as using. We 15 would have to convert it in an analog-to-digital converter 16 into a digital stream. Then that digital stream would 17 have to go into memory that is digital. And for every 18 analog cell, we would now have to replace it with 10 19 digital cells. And then on the other end, we would have 20 to have a digital analog converter that then feeds into 21 the columns. 22 That is very different than anything that is 23 contemplated or described in the patents. And if we only 24 take the approach of replacing the analog cell with a 25 digital cell, as I said, we end up with a nonoperating</p>

<p>81</p> <p>1 device. It cannot represent gray scale. It could only</p> <p>2 turn the display fully on or fully off. And that was not</p> <p>3 the intent of the invention as presented in the patents.</p> <p>4 Q You say you're qualified to say -- to speak on</p> <p>5 the intent of the invention?</p> <p>6 A Please repeat your question. I'm sorry. I'm</p> <p>7 having trouble understanding.</p> <p>8 Q So are you qualified to speak of the -- to speak</p> <p>9 on the intent of the invention?</p> <p>10 A Oh, I -- to the extent that this would be totally</p> <p>11 different than anything the patent contemplates, yes, I</p> <p>12 think I am qualified to speak on that. I mean, I know</p> <p>13 that -- I've read the specification. I've read the</p> <p>14 claims. I know what the patent's about. So if the</p> <p>15 inventors wanted to provide or patent a digital version,</p> <p>16 they sure could have done that.</p> <p>17 But they didn't do that. They patented an</p> <p>18 entirely analog process. And in describing and patenting</p> <p>19 that process, they have presented a structure that cannot</p> <p>20 be converted to digital using the layout that they have.</p> <p>21 It is impossible to replace the analog cells with digital</p> <p>22 cells and have anything that resembles an operating</p> <p>23 device.</p> <p>24 Q So Dr. Silzars, is your analysis tied to the</p> <p>25 embodiments that are disclosed inside of the</p>	<p>83</p> <p>1 BY MR. MILLER:</p> <p>2 Q Specifically as it relates to the non-volatile --</p> <p>3 A I just pulled up claim 1 of the '305</p> <p>4 (indicating).</p> <p>5 Well, first of all, in terms of plurality of</p> <p>6 inputs, we have to rely on the specification that those</p> <p>7 are analog inputs. A digital signal would not be a</p> <p>8 plurality of inputs. And then the claim of -- then we</p> <p>9 have drivers connected to said storage cells and the</p> <p>10 plurality of outputs. Of course those go to the display.</p> <p>11 And that is a purely analog signal. So we cannot have a</p> <p>12 digital signal on the display.</p> <p>13 So we have an input that's been described as</p> <p>14 analog, and we have an output that has to be analog. And</p> <p>15 then, of course, it mentions the plurality of influx</p> <p>16 connected to the multiplexer. There's nothing in here</p> <p>17 that would indicate the conversion to a digital signal.</p> <p>18 So that would indicate it's all analog.</p> <p>19 And the fact that the gamma voltage signals,</p> <p>20 those would be analog. And that's -- then the rest is</p> <p>21 simply talks about banks of gamma reference voltage signal</p> <p>22 display conditions. So there -- it's very clear that</p> <p>23 claim 1 only contemplates an analog signal. And as I</p> <p>24 described, if you try to play the game of replacing those</p> <p>25 cells with a digital cell, it just doesn't work. It can't</p>
<p>82</p> <p>1 specifications only?</p> <p>2 A Did my analysis do -- yeah. I can't -- you're</p> <p>3 way far away. You're behind your name.</p> <p>4 Q (Indiscernible.)</p> <p>5 A I can't see your face. If you want to do</p> <p>6 something different here.</p> <p>7 Q Let me repeat --</p> <p>8 A I'm not getting your questions.</p> <p>9 Q I'm trying -- you're talking over me now. I'll</p> <p>10 say it again. Is your analysis limited to the embodiments</p> <p>11 that are disclosed in the patent?</p> <p>12 A My analysis is limited to the specification and</p> <p>13 to the claims. And if the claims -- the claims can -- the</p> <p>14 specification is typically exemplary embodiment. There</p> <p>15 can be others. So to the extent that the claims could</p> <p>16 encompass embodiments that are different or an expansion</p> <p>17 of what's -- what the exemplary claims are, the claims</p> <p>18 take precedence. So the specification describes preferred</p> <p>19 embodiments. But the claims are usually what is</p> <p>20 considered the final word in terms of what the invention</p> <p>21 encompasses.</p> <p>22 Q All right. So where in the claim, claim 1 of the</p> <p>23 '305, would you say that claim 1 is limited to analog?</p> <p>24 MR. KENDRICK: Object to the form.</p> <p>25 ///</p>	<p>84</p> <p>1 make it -- can't make it work.</p> <p>2 Q And I'm going to repeat. Why couldn't it work?</p> <p>3 Is it because of the connection language?</p> <p>4 A Oh, it's -- if you convert those to digital</p> <p>5 cells, you cannot get gray scale. As I said, the -- it --</p> <p>6 there is no possible alternative to driving the columns in</p> <p>7 anything other than an analog mode. So we have to have an</p> <p>8 analog signal going to the columns. And everything that's</p> <p>9 described here simply shows how we get from an input to</p> <p>10 storage to providing the signal to the display.</p> <p>11 Q Okay. I'm going to ask: Does the information</p> <p>12 that you just provided there -- do you have that included</p> <p>13 inside of your declaration?</p> <p>14 A I've given you more details in my explanation</p> <p>15 right now. But where I mention that very briefly in my</p> <p>16 declaration was in paragraph 164. And it said, "detailed</p> <p>17 programming methodology involving incremental voltage</p> <p>18 adjustments, realtime monitoring, and close-loop</p> <p>19 verification is, in my opinion, incompatible with digital</p> <p>20 storage and only functions with analog memory cells."</p> <p>21 So I said it. Maybe I should have expanded on it</p> <p>22 further. But I said it's incompatible with digital memory</p> <p>23 cells. So that's the same as my more elaborate</p> <p>24 explanation that I've just been providing.</p> <p>25 Q Okay. Thank you very much. I'm going to ask</p>

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Conducted on June 10, 2025

22 (85 to 88)

<p>85</p> <p>1 this. I'm going to go back to a question that I asked 2 earlier that was -- kind of went away from that. But I'm 3 just curious. You do have an analysis in here that 4 relates to non-volatile storage cells where you are 5 discussing the '305 patent teaching away from the use of 6 digital solution. And I just wanted to know from you, are 7 you qualified to give an opinion as to whether or not the 8 patent teaches away a solution?</p> <p>9 <b>A Well, in doing the -- analyzing what was in the</b> 10 <b>'305 patent, I did note that the inventors were teaching</b> 11 <b>really away from a digital solution as being too complex</b> 12 <b>and too expensive. So that was really to provide a sense</b> 13 <b>of what the inventors were thinking and describing when</b> 14 <b>they were creating their invention as an analog device.</b></p> <p>15 Q All right. Dr. Silzars, let's just -- 16 MR. MILLER: I'm going to take a quick break. 17 Counsel, can we go off the record? 18 THE STENOGRAPHER: Off the record at 11:44 a.m. 19 (Off the record.) 20 THE STENOGRAPHER: Back on the record at 21 11:49 a.m. Please proceed. 22 MR. MILLER: All right. Counsel, we pass 23 Dr. Silzars. 24 MR. KENDRICK: I have -- I'm sorry, Rodney. Say 25 again.</p>	<p>87</p> <p>1 ) 2 STATE OF CALIFORNIA ) 3 ) 4 CERTIFICATE OF REPORTER 5 I, JUSTYNE N. JOHNSON, do hereby certify that the 6 witness in the foregoing deposition was by me duly 7 affirmed to tell the truth, the whole truth and nothing 8 but the truth in the within-entitled cause; that said 9 deposition was taken at the time and place therein stated; 10 that the testimony of said witness was reported by me and 11 was thereafter transcribed under my direction and 12 supervision; that the foregoing is a full, complete and 13 true record of said testimony; that the witness was given 14 an opportunity to read and, if necessary, correct said 15 deposition and to subscribe the same. 16 I further certify that I am not of counsel or 17 attorney for any of the parties in the foregoing 18 deposition and caption named, or in any way interested in 19 the outcome of the cause named in said caption. 20 IN WITNESS WHEREOF, I have hereunto set my hand 21 this 10th day of June, 2025. 22 23 24 <u>Justyne Johnson</u> 25 JUSTYNE N. JOHNSON, CSR NO. 14301</p>
<p>86</p> <p>1 MR. MILLER: I'm passing him. Do you have 2 anything? 3 MR. KENDRICK: No questions from us. 4 Kasey? 5 MS. KOBALLA: No. Nothing from me. 6 MR. KENDRICK: Okay. All right. 7 MR. MILLER: Dr. Silzars, thank you very much for 8 your time. 9 And we can go off the record. 10 THE STENOGRAPHER: Off the record at 11:50 a.m. 11 (Time noted 11:50 a.m.) 12 13 ---o0o--- 14 15 16 17 18 19 20 21 22 23 24 25</p>	





R. Tyler Kendrick, Esquire  
Perkins Coie, LLP  
1301 Second Avenue Suite 4200  
Seattle, WA 98101

Re: Deposition of **Aris Silzars**

Date: 6/10/2025

Case: Phenix Longhorn LLS -v- AU Optronics Corp., et al.

Dear Sir/Madam,

Attached please find the above-referenced deposition transcript. If applicable, signature is required within 30 days from the date of receipt of this letter.

In accordance with the disposition of signature at the deposition or the pertinent jurisdictional rules, the deponent should follow these instructions to complete the Errata Sheet:

- (1) Read the transcript and indicate any corrections or changes in ink on the enclosed Errata Sheet. Please include page and line numbers. If more space is needed for corrections, please use a blank sheet of paper. If no corrections or changes are necessary, please indicate "no corrections" or "no changes" on the Errata Sheet.
- (2) Sign and date the Errata Sheet and Acknowledgement of Deponent/Affiant pages.
- (3) Please return the executed Errata Sheet and Acknowledgement pages to the address indicated below, submit via fax (888-503-3767) or email ([transcripts@planetdepos.com](mailto:transcripts@planetdepos.com)).

A copy of this letter and the returned signature pages, if any, will be distributed to counsel.

Sincerely,

Production Department  
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451 Hungerford Drive  
Suite 400  
Rockville, Maryland 20850

No. 586699

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Page	Line	Correction/Change and Reason
10	21	"Yeah" should be "Yes" - misspoken word
12	8	"patent" should be patents - transcription error
13	13	"renewal" should be "referenced" - transcription error
16	24	"5305" should be "505" - transcription error
17	17	"No" should be omitted - transcription error
18	21	"laws" should be "law" - transcription error
19	3	"that's" should be "that have" - transcription error
23	22	"since there" should be "since then" - transcription error
24	25	"of" should be "and" - transcription error
25	5	"on a" should be "on" - transcription error
26	18	"We're" should be "They were" - transcription error
29	1	"Lance" should be "Lanxide" - transcription error
30	11	"that" should be "at" - transcription error
30	24	"engineers" should be "engineers and" - transcription error
32	16	"as a" should be "as" - transcription error
32	19	"analysis" should be "analysis and" - transcription error
35	9	"on" should be "on it" - transcription error
36	3	"doing" should be "going" - transcription error
37	22	"analog's" should be "Innolux" - transcription error
41	12	"they --" should be "they are" - transcription error
54	24	"Analysis" should be "My analysis" - transcription error

7/8/2025  
(Date)

  
(Signature)



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60	8	"that that" should be "that it" - transcription error
70	6	"it's" should be "is" - transcription error
76	11	"we've" should be "were" - transcription error
76	18	"to" should be "to use" - transcription error
80	4	"ten 24" should be "1024" - transcription error
80	7	"ten 24" should be "1024" - transcription error
80	9	"ten 24" should be "1024" - transcription error
80	20	"digital" should be "digital to" - transcription error
83	15	"influx" should be "inputs" - transcription error
83	25	"it" should be "I" - transcription error

7/8/2025  
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(Signature)

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ACKNOWLEDGMENT OF DEPONENT

I, Aris Silzars, do hereby acknowledge that  
I have read and examined the foregoing testimony, and  
the same is a true, correct and complete  
transcription of the testimony given by me and any  
corrections appear on the attached Errata sheet  
signed by me.

7/8/2025        
(Date)                      (Signature)